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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

RICHARD ZEITLIN, ADVANCED  
TELEPHONY CONSULTANTS, MRZ  
MANAGEMENT, LLC, DONOR  
RELATIONS, LLC, TPFE, INC., AMERICAN  
TECHNOLOGY SERVICES, COMPLIANCE  
CONSULTANTS, CHROME BUILDERS  
CONSTRUCTION, INC., and UNIFIED  
DATA SERVICES,

Plaintiffs,

v.

BANK OF AMERICA, N.A., and JOHN and  
JANE DOES 1-100,

Defendants.

Case No.: 2:18-cv-01919-RFB-CWH

**STIPULATION AND ORDER TO  
EXTEND REPLY DEADLINE TO  
DECEMBER 14, 2018**

**(FIRST REQUEST)**

Pursuant to Local Rule 7-1, Plaintiffs Richard Zeitlin; Advanced Telephony Consultants; MRZ Management, LLC; Donor Relations, LLC; TPFE, Inc.; American Technology Services; Compliance Consultants; Chrome Builders Construction, Inc.; and Unified Data Services (the “Plaintiffs”) and Defendant Bank of America, N.A. (“BANA”), by and through their respective undersigned counsel of record, submit this Stipulation and Proposed Order for a one week extension of BANA’s deadline to file its Reply to Plaintiffs’ Response to Defendant’s Motion to

Dismiss (ECF No. 17) (the “Response”) from December 7, 2018 to December 14, 2018.

Plaintiffs filed their Complaint in this action on October 5, 2018. BANA filed its Motion to Dismiss the Complaint on November 16, 2018. Plaintiffs filed the Response on November 30, 2018. BANA’s deadline to file its Reply to the Response is currently December 7, 2018.

This is the Parties’ first request for an extension of BANA’s time to file its Reply to the Response and is not intended to cause any delay or prejudice to any party. The reason for the extension is to give BANA time to evaluate and respond to the arguments set forth in the Response.

IT IS HEREBY STIPULATED AND AGREED by and between the Parties that the time for BANA to file its Reply to the Response is extended to and through December 14, 2018.

Dated: December 4, 2018

Dated: December 5, 2018

THE BERNHOFT LAW FIRM, S.C.

SNELL & WILMER L.L.P.

By: /s/ Thomas E. Kimble

By: /s/ Kiah Beverly-Graham

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*Attorneys for Plaintiffs, pro hac vice*

*Attorneys for Bank of America, N.A.*

**ORDER**

IT IS SO ORDERED:



RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

DATED this 7th day of December, 2018.

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND REPLY DEADLINE TO DECEMBER 14, 2018** with the Clerk of the Court for the U. S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED: December 5, 2018

/s/ Lara J. Taylor  
An Employee of Snell & Wilmer L.L.P.